

RB:DHW
F. #2018R00484

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

CARL ANDREWS,
also known as "Day" and
"DaShawn,"

Defendant.

-----X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Commit Sex Trafficking
by Force, Fraud, or Coercion)

1. From in or about March 2018, up to and including in or about May 2018, in the Eastern District of New York and elsewhere, the defendant CARL ANDREWS, also known as "Day" and "DaShawn," together with others known and unknown, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2) and (b).

2. It was a part and an object of the conspiracy that the defendant CARL ANDREWS, also known as "Day" and "DaShawn," and others known and unknown, knowingly, in and affecting interstate and foreign commerce, would and did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means

W I J
FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ DEC 02 2020 ★
LONG ISLAND OFFICE
INDICTMENT
C R No. 20 546
(T. 18, U.S.C., §§ 371, 981, 982,
1591(a), 1591(b)(1), 1592(a)(3),
1594(a), 1594(c), 1594(d) and 2; T. 21,
U.S.C., §§ 846 and 853; and T. 28,
U.S.C., § 2461)

BROWN, J.
LOCKE, M. J.

one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one and more commercial sex acts.

(Title 18, United States Code, Section 1594(c))

COUNT TWO

(Sex Trafficking by Force, Fraud, or Coercion)

3. From in or about March 2018, up to and including May 2018, in the Eastern District of New York and elsewhere, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and attempted to do so, to wit, ANDREWS recruited, harbored, transported, provided, obtained, advertised, and maintained a female person, Victim-1, an individual whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that force, threats of force, fraud, coercion, and a combination of such means, were used to cause Victim-1 to

engage in at least one commercial sex act, the proceeds of which were transferred at least in part to ANDREWS.

(Title 18, United States Code, Sections 1591(a), 1591(b)(1), 1594(a), and 2)

COUNT THREE
(Conspiracy to Violate the Travel Act)

4. From in or about March 2018, up to and including in or about May 2018, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” together with others known and unknown, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, a violation of the Travel Act, in violation of Title 18, United States Code, Section 1952(a).

5. It was a part and an object of the conspiracy that the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” and others known and unknown, knowingly would and did travel in interstate and foreign commerce and would and did use the mail and a facility in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, prostitution offenses in violation of the laws of the State in which they were committed and of the United States, and thereafter would and did perform and attempt to perform acts to promote, manage, establish and carry on, and to facilitate the promotion, management, and carrying on of such unlawful activity.

OVERT ACT

6. In furtherance of said conspiracy and to effect its illegal object, the following overt act, among others, was committed in the Eastern District of New York and elsewhere:

(a) from in or about March 2018 up to and including in or about May 2018, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” purchased and published advertisements on the Internet offering commercial sex acts to purchasers of commercial sex acts in the Eastern District of New York and elsewhere.

(Title 18, United States Code, Section 371)

COUNT FOUR
(Travel Act)

7. From in or about March 2018, up to and including in or about May 2018, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” knowingly did travel in interstate and foreign commerce and did use the mail and a facility in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, prostitution offenses in violation of the laws of the State in which they were committed and of the United States, and thereafter performed and attempted to perform acts to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3) and 2)

COUNT FIVE
(Narcotics Conspiracy)

8. From at least in or about 2017, up to and including on or about February 27, 2019, in the Eastern District of New York and elsewhere, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

9. It was a part and an object of the conspiracy that the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

10. The controlled substance that the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” conspired to distribute and possess with intent to distribute was 28 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846)

CRIMINAL FORFEITURE ALLEGATION

11. As a result of committing the offenses alleged in Counts One and Two of this Indictment, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One and Two, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or

indirectly, as a result of the offenses alleged in Counts One and Two, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

12. As a result of committing the offenses alleged in Count Three and Four of this Indictment, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offenses; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

13. As a result of committing the offense alleged in Count Five of this Indictment, the defendant CARL ANDREWS, also known as “Day” and “DaShawn,” shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

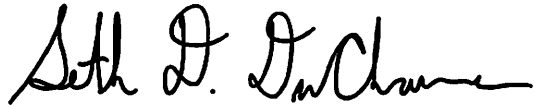
subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 2253(b), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982 and 1594(d); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461)

A TRUE BILL


FOREPERSON


SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: #2018R00484
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

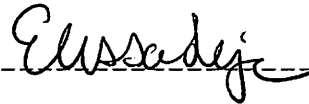
CARL ANDREWS,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 371, 981, 982, 1591(a), 1591(b)(1), 1592(a)(3),
1594(a), 1594(c), 1594(d) and 2; T. 21, U.S.C., §§ 846 and 853; and T.
28, U.S.C., § 2461)

A true bill.



Foreperson

Filed in open court this ----- day,

of ----- A.D. 20 -----

Clerk

Bail, \$ _____

[AUSA NAME], Assistant U.S. Attorney 718/631Insert Extension